

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
The Telephone Company, Inc.	

THE TELEPHONE COMPANY, INC. COMPLIANCE PLAN

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The Telephone Company, Inc. (“TTC” or the “Company”), through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ TTC was previously designated as an Eligible Telecommunications Carrier (“ETC”) in Oklahoma for wireline services on December 15, 2004, and for wireless services on July 28, 2011.

TTC will continue to comply with 911 requirements as described below and is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act.²

TTC has complied and will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally. This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company has taken to implement the obligations contained in the Lifeline Reform Order, including the procedures the Company follows in enrolling a subscriber in Lifeline and requesting

¹See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96- 45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). TTC is submitting the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

²See *Lifeline Reform Order*, ¶ 368. Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in the state for purposes of state universal service funding under state program rules and requirements.

reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company will offer Lifeline services, the geographic areas in which it has offered and will continue to offer services, and a detailed description of the Company's Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.³ The Company has complied with these conditions.

The Company provides its Lifeline customers with access to 911 and E911 services immediately upon activation of service. All Company customers have available access to emergency calling services at the time that Lifeline service is initiated, and such 911 and E911 access is and will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

The Company uses AT&T as its underlying wireless network providers/carrier through a Mobile Virtual Network Enabler (MVNE) intermediary – Red Pocket (“Red Pocket”). AT&T routes 911 calls from the Company's customers in the same manner as 911 calls from its own retail

³See *Lifeline Reform Order*, ¶ 373.

customers. To the extent that AT&T is certified in a given PSAP territory, this 911 capability functions the same for the Company. The Company also enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

The Company ensures that all handsets used in connection with its Lifeline service offerings are E911-compliant. All of the Company's phones are E911-capable handsets. The Company uses phones from suppliers that have been certified to ensure that the handset models used meet all 911 and E911 requirements. As a result, any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. LIFELINE SUBSCRIBER ENROLLMENT PROCEDURES

A. Policy

The Company will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification

requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

TTC enrolls its Lifeline customers in-person at the storefronts of an affiliated company, Cashland, which operates throughout Oklahoma. Because of the use of permanent Cashland storefront locations, TTC customers always know where they can go to ask questions, get replacement equipment (e.g., batteries and chargers) and purchase additional services or upgrades. TTC enrolls its customers at store locations (Cashland, which is owned by the same family that owns TTC). In the process of enrollment, TTC obtains and scans photo ID's, and obtains the verification of the customer as to identity and address on the enrollment form. TTC also obtains eligibility proof, which is cross-checked and entered into the enrollment information. When available, TTC will validate the eligibility and non-duplication of qualifying subscribers through the national database.

The customer verifies, under penalty of perjury, that the information being provided, including identity and address, is true and correct. The customer's photo ID is appended to the customer's account information.

All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria.⁴ These personnel are trained to answer questions about Lifeline eligibility, and review required documentation to determine whether it satisfies the Lifeline Reform Order and state-specific eligibility requirements.

⁴See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

Proof of Eligibility. Company (and Cashland) personnel are trained on acceptable documentation required to establish income-based and program-based eligibility.⁵ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.⁶

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three consecutive months' time.⁷

Company (and Cashland) personnel examine this documentation for each Lifeline applicant, and record the type of documentation and the type of benefit used to satisfy the income- or

⁵See *Lifeline Reform Order*, ¶101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>

⁶*Id.* and section 54.410(c)(1)(i)(B).

⁷See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

program-based criteria by checking the appropriate box on the application form.⁸ The Company does not retain a copy of this documentation.⁹ In addition, a TTC employee is responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement.

TTC requires Cashland employees involved in the enrollment process to go through TTC's training process. By establishing agency relationships with all of its Company personnel, including any possible future Cashland or other agency outlets, TTC meets the "deal directly" requirement adopted in the TracFone Forbearance Order.¹⁰

The Commission determined in the *Lifeline Reform Order* that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"¹¹ Because TTC is responsible for the actions of all of its employees and agents with respect to customer enrollment, and a TTC employee is responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, TTC will always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

⁸See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

⁹See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁰See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket no. 96-45, Order, FCC 05-165, ¶19 (2005).

¹¹ See *Lifeline Reform Order*, ¶ 110.

De-Enrollment for Ineligibility. If the Company has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹² The demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request in person or in writing.

C. Subscriber Certifications for Enrollment

The Company has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company (and Cashland) personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹³ The Company shares the Commission's concern about the integrity of the Lifeline program and is thus committed to the safeguards stated in this Compliance Plan, and believes that these safeguards will prevent the Company's customers from engaging in abuse of the program, inadvertently or intentionally. Every applicant is required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.¹⁴ Applicants

¹²See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

¹³See *Lifeline Reform Order*, ¶ 61; section 54.410(a).

¹⁴See Model Enrollment Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

that seek to enroll based on income eligibility are referred to a worksheet showing the Federal Poverty Guidelines by household size.¹⁵ Applicants complete the form in person. In addition, Company personnel verbally explain the certifications to consumers when they are enrolling, in person.¹⁶

Disclosures. The Company's application and certification (enrollment) forms include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.¹⁷

Applications and certification (enrollment) forms also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.¹⁸

¹⁵See Income Eligibility Worksheet, included as Exhibit B.

¹⁶See *Lifeline Reform Order*, ¶123.

¹⁷See *id.*, ¶121; section 54.410(d)(1).

¹⁸See section 54.405(c).

In addition, the Company notifies the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.¹⁹

Information Collection. The Company collects the following information from the applicant in the application/certification (enrollment) form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient²⁰); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²¹

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company requires the applicant to certify, under penalty of perjury, in writing by electronic signature recording in TTC's secure system,²² the following: (1) the applicant meets the income- based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days

¹⁹See *Lifeline Reform Order*, ¶257.

²⁰See *Lifeline Reform Order*, ¶ 87.

²¹See section 54.410(d)(2).

²²See *Lifeline Reform Order*, §§168-69; section 54.419.

if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant is required to authorize the Company to access any records required to verify the applicant's statements on the application/certification (enrollment) form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the

Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.²³

D. Annual Verification Procedures

The Company annually re-certifies and will continue to re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.²⁴ Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.²⁵ The Company has re-certified the eligibility of its existing subscribers as of June 1, 2012, and has reported the results to USAC.²⁶

Verification De-Enrollment. The Company will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.²⁷ The Company will give

²³See Section 54.404(b)(9). The application/certification (enrollment) form describes the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.*

²⁴See Lifeline Reform Order, ¶120.

²⁵See *id.*, ¶145.

²⁶See *id.*, ¶130.

²⁷See *id.*, ¶142; section 54.54.405(e)(4).

subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

E. Activation and Non-Usage

The Company does not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the Company activates the Company's prepaid service by completing a test call. A code must be entered and a test call must be made in order for the service to be activated and for TTC to seek Lifeline reimbursement for that customer. For phones sold in-person, a representative enters a code and makes a test call with the customer present in order to make certain that the phone is operational and in order to complete the enrollment process. Phones are not mailed to customers.

In addition, after service activation, in the event that the Company no longer has a Lifeline plan that involves a charge to customers (see below - the Company currently bills its customers), the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.²⁸ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company;

²⁸See *Lifeline Reform Order*, ¶257; section 54.405(e)(3).

or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.²⁹

Under such a non-billing scenario, if the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.³⁰

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking its database, Company personnel will emphasize the “one Lifeline phone per household” restriction in their direct contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company (and Cashland) personnel interacting with existing and potential Lifeline customers undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order*.

Company (and Cashland) personnel that will interact with existing and potential Lifeline customers are and will be required to complete a rigorous training program. During this program,

²⁹See *Lifeline Reform Order*, ¶261; section 54.407(c)(2).

³⁰See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

Company (and Cashland) personnel are thoroughly trained on compliance practices, policies and procedures including, among other areas, a thorough training on the enrollment process. For example, Company personnel that will perform customer enrollment are trained on how to use the Company's office support systems, to read aloud the appropriate disclosures to prospective customers such as the "one-per-household" and activation and non-usage requirement disclosures, request additional documentation proving identity and address verification and what constitutes proof of eligibility, among other important practices.

Company (and Cashland) personnel are also trained to display approved marketing materials and banners. TTC has a designated employee compliance training manager who is accessible to Company (and Cashland) personnel for questions after training. Company (and Cashland) personnel are also trained what to do in the event they suspect fraud or any violation. The Company has a whistleblower policy for Company personnel to immediately report any violation of compliance policies and procedures.

Database. When the National Lifeline Accountability Database ("NLAD") becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the NLAD to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.³¹

³¹See *Lifeline Reform Order*, ¶203. The Company will also transmit to NLAD the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶189-195; section 54.404(b)(6). Further, Company will update each subscriber's information in NLAD within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

One-Per-Household. The Company has implemented the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household³² through the use of its application and certification (enrollment) forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.³³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).³⁴ Further, if a subscriber provides a temporary

³²A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶74; section 54.400(h).

³³See *Lifeline Reform Order*, ¶78.

³⁴Id. The USAC worksheet is available at: <http://www.usac.org/li/tools/news/default.aspx#582>.

address on his or her application/certification (enrollment) form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.³⁵

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. TTC will also ask each customer whether the customer is receiving Lifeline service from one of the other major Lifeline providers in the state.

Marketing Materials. Within the deadline provided in the Lifeline Reform Order, the Company has included the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; (7) TTC's name (the ETC); and (8) the Company's application/certification form states that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.³⁶ These statements are included in all print, audio video and web materials used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification

³⁵See *Lifeline Reform Order*, ¶89.

³⁶See *Lifeline Reform Order*, ¶275; section 54.405(c).

forms.³⁷ This includes the Company's website (www.ttcok.com) and outdoor signage.³⁸ A sample of the Company's marketing materials is included as Exhibit C.

G. Company Reimbursements From the Fund

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.³⁹ Further, the Company will submit its FCC Forms 497 the eighth day of each month in order to be reimbursed the same month.⁴⁰

In addition, the Company will keep accurate records as directed by USAC⁴¹ and as required by new section 54.417 of the Commission's rules. For example, TTC will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that TTC queried the duplicates database; 2) date and information that TTC transmitted to the duplicates database; 3) date of transmission of updated customer information to database; 4) date and database upon which the ETC determined income-based eligibility where available; 5) date and documentation/data source used to determine income-based eligibility if no

³⁷*Id.*

³⁸*Id.*

³⁹See *Lifeline Reform Order*, ¶128; section 54.407(d).

⁴⁰See *Lifeline Reform Order*, §§302-306.

⁴¹See section 54.407(e).

database was available to determine subscriber eligibility;⁴² 6) date, database, and program on which ETC determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

H. Annual Company Certifications

The Company has submitted and will continue to submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁴³ (2) is in compliance with all federal Lifeline certification procedures;⁴⁴ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁴⁵

In addition, the Company will provide the results of its annual recertifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁴⁶ Further, as discussed above, the

⁴²Such documentation includes the documentation listed in Section I.B, *supra*.

⁴³See *Lifeline Reform Order*, ¶126; section 54.416(a)(1).

⁴⁴See *Lifeline Reform Order*, ¶127; section 54.416(a)(2).

⁴⁵See section 54.416(a)(3).

⁴⁶See *Lifeline Reform Order*, ¶¶132,148; section 54.416(b).

Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴⁷

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁴⁸ the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁴⁹ The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁵⁰ Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁵¹

I. Cooperation with State and Federal Regulators

The Company has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

⁴⁷See *Lifeline Reform Order*, ¶257; section 54.405(e)(3).

⁴⁸See section 54.422(c).

⁴⁹See *Lifeline Reform Order*, ¶¶296, 390; section 54.422(a).

⁵⁰See *Lifeline Reform Order*, ¶390; section 54.422(b)(5).

⁵¹See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier ;⁵²
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicate enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicate Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁵³ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings

The Company will offer its Lifeline service in the states where it is designated as an ETC (currently only in Oklahoma) and throughout the coverage area of AT&T's wireless footprint.

TTC's current Lifeline plan options are as follows:

\$1.00 Plan**: Unlimited Talk

This plan includes unlimited voice minutes per month (there are no rollover minutes). There is a nationwide calling scope

\$5.00 Plan**: Unlimited Talk, Text, Picture Messaging

This plan includes unlimited voice minutes and text messages per month, including picture messaging (there are no rollover minutes). There is a nationwide calling scope.

\$9.95 Plan**: Unlimited Talk, Text, Picture Messaging, 100 MB of Data & Unlimited International Calling to Canada, China, Mexico*, India*, United Kingdom* (*Select Cities Only, Landlines Only)

⁵²The Company anticipates that the need to provide such information will terminate following the implementation of the national duplicates database.

⁵³See section 54.405(e)(1).

This plan includes unlimited nationwide voice minutes and text messages per month, including picture messaging (there are no rollover minutes), plus 100 megabytes of data and international calling as stated above.

**** All plans have an excessive use limitation, primarily related to text messages.**

Customers may select either a free wireless handset or purchase an upgraded phone, such as a smartphone. The Company has a plan option that allows low-income customers to add affordable data usage to their free voice/text minutes thereby supporting greater smartphone utilization, consistent with the Commission's goal of promoting broadband access to all Americans. Additional information regarding the Company's plans, rates and services can be found on its website www.ttcok.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁵⁴ The Compliance Plan Public Notice requires that carriers' compliance plans include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

TTC has been providing wireline Lifeline service in Oklahoma since 2005, and wireless ETC

⁵⁴See *Lifeline Reform Order*, ¶¶387-388 (revising Commission rule 54.202(a)(4)).

services in Oklahoma since 2011. TTC received a Certificate of Convenience and Necessity from the Oklahoma Corporation Commission to provide local and long distance wireline services in August 2003, and TTC has been providing local and long distance non-Lifeline services in Oklahoma since then. TTC does not rely exclusively on Lifeline reimbursement for the Company's operating revenues. TTC is in good standing with all vendors.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules." The Company certifies that it will comply with the service requirements applicable to the support the Company receives.⁵⁵ The Company will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC (currently, Oklahoma only). The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. The Company's Lifeline offerings include packages in Section II supra that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS"). TTC, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all

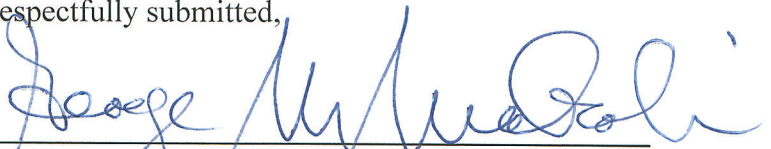
⁵⁵47 C.F.R. §54.202(a)(1).

usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁵⁶

IV. Conclusion

TTC submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's Lifeline Reform Order, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



George M. Makohin, OBA #5639
Downing Place
6520 N. Western, Suite 202
Oklahoma City, Oklahoma 73116
Telephone: (405) 858-7220
Fax: (405) 858-8601
Email: gmmok@att.net

ATTORNEY FOR
THE TELEPHONE COMPANY, INC.

⁵⁶See Lifeline Reform Order, ¶230.

EXHIBIT A

Telephone Co. Online

[Home](#) [Add Customer](#) [Signups](#) [Changes](#) [Re-certs](#) [Services](#) [Dupe Code](#) [Logout](#)

User: AKH Store: PHONE

Employee Initial:

Lifeline Wireless Application

* - Optional fields

Lifeline Certification:

Do you currently have a lifeline phone service, either landline or cell phone?
☐ I acknowledge that, to the best of my knowledge, no one else at my household is receiving a Lifeline-supported service from any other provider.
Certification Date: Format: mm/dd/yyyyCertification Renewal Date: Format: mm/dd/yyyyWork Phone Number: Format: 405-555-1234 (Your contact # during weekdays between 8am and 5pm)Social Security Number: Date Of Birth: Format: mm/dd/yyyy**Eligibility By Program**

I participate in at least ONE of the following programs:

- ☐ Food Stamps
- ☐ Aid to Families with Dependent Children (AFDC)
- ☐ Supplemental Security Income (SSI)
- ☐ Medical Assistance (Medicaid)
- ☐ Vocational Rehabilitation (including aid to the hearing impaired)
- ☐ Oklahoma Sales Tax Relief
- ☐ Federal Public Housing
- ☐ Low Income Energy Assistance Program
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs
- ☐ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
- ☐ National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals)

Qualifying Beneficiary

Name:

- ☐ I certify that individual named on documentation demonstrating program participation is part of my Household.
- ☐ I certify that individual named on documentation demonstrating program participation does not already receive Lifeline.

Eligibility By Income

If your income is at or below 135% of the federal poverty guidelines, as shown below, you can qualify for Lifeline.

How many people are in your Household? (complete only if qualifying under this Section)

Household Size	Total Annual Income	Household Size	Total Annual Income	Household Size	Total Annual Income
1 person	\$15,080	3 people	\$25,772	5 people	\$36,464
2 people	\$20,426	4 people	\$31,118	Each additional person	\$5,346

Customer Certification Rules

- ☐ I certify under penalty of perjury that I either participate in the indicated qualifying federal program or I meet the income qualification to establish my eligibility for Lifeline. If required to do so, I have provided accurate documentation of my eligibility.
- ☐ I certify I am head of the household, I am an adult 18 years or older (unless an emancipated minor), I am not listed as a dependent on another person's tax return (unless over the age of 60) and the address listed is my primary residence.

I confirm local voice service discounts under the low income programs are limited to one per household and that my household is receiving no more than one Lifeline supported service. If I am participating in another Lifeline program at the time I apply for TTC's Lifeline service, I agree to cancel that Lifeline service with any other provider. I certify that I will only receive one Lifeline connection, will not have simultaneous or multiple Lifeline discounts with another provider. I understand that I must inform TTC within 30 days if I (1) no longer participate in a federal qualifying program or programs or my annual household income exceeds 135% of the Federal Poverty Guidelines; (2) I am receiving more than one Lifeline-supported service per household; or (3) I, for any other reason, no longer satisfy the criteria for receiving Lifeline support. I attest under penalty of perjury that I understand this notification requirement, and that I may be subject to penalties if I fail to follow this rule.

☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of the my Lifeline benefits.

☐ I understand that Lifeline service is a non-transferable benefit, and that I may not transfer my service to any other individual, including another eligible low-income consumer.

I hereby authorize TTC to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize TTC to release any records required for the administration of the Lifeline program (name, telephone number, address, date of birth, last 4 digits of SSN or Tribal ID, amount of support being sought, means of qualification for support, and dates of service initiation and termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

☐ I understand that if I move, I must provide a new address to TTC within 30 days of my move. I understand that if I provided a Temporary Address, I must verify with TTC every 90 days that I am using the same address. I understand that if I fail to do so, I will lose my Lifeline discount.

☐ I certify that my address is on federally recognized tribal lands.

☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

☐ The information in this certification is true and correct to the best of my knowledge.

Representative Full Name:

Documentation Reviewed:

Attach ID:

Physical Address:

Listing Name: (first) (last)

Physical Address:

City:

State: Zip: Temporary address: ☐

County:

Billing Address:

☐ Same as Physical Address

Billing Name: (first) (last)

Address:

City:

State: Zip:

In the event of a problem call:

Contact's Name:

Contact Phone Number: Format: 405-555-1234

Wireless Phone Number: Format: 405-555-1234 (wireless number just activated)

Choose services:

Service	Monthly Rate	Connection Fee
Wireless Lifeline Unlimited Talk \$1.00	<input type="checkbox"/> \$1.00	\$30.00
Wireless Lifeline Talk & Text Only		

\$5.00	<input type="checkbox"/>	\$5.00	Free
Wireless Lifeline Unlimited Plus \$9.95	<input type="checkbox"/>	\$9.95	\$30.00
Total:		\$0.00	\$0.00

Payment:

Connection Fees:

☐ Full payment \$☐ 3 installments \$☐ 6 installments \$

Monthly Rate:

Sales Tax (12%):

911, Num Port., Fed Line, Relay Tax: \$0.00

Credit Card Fee:

☐ Pay with credit card

Enhanced Lifeline Non-State Eligible: \$0.00

*Additional Payment:

Total Due:

*Credit Card Number: *Expiration: / *Confirmation #:

Miscellaneous:

*Notes:

Reminders:

How Did You Hear About Us? TV Bill Payment Options ☐Agent Expedite Fee ☐Suspend ☐

Signature:

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EXHIBIT B

Home Phone Service Programs

Lifeline Program

- \$1.95 a month
- Connection fee of \$29.38

Connection fee payments may be deferred for up to 6 months. Stop by one of our Cashland locations for program details.

Lifeline Add on Packages

\$3.00 Silver Package:

- Caller ID
- Call Waiting
- Three Way Calling
- Call Waiting ID

Silver Package plus 150 Long Distance Minutes is only \$5.00 per mo.

\$4.00 Gold Package:

- Silver Package
- Call Blocker
- Call Forwarding

Gold Package plus 300 Long Distance Minutes is only \$8.00 per mo.

\$10.00 Unlimited Long Distance

- Unlimited Minutes of Long Distance

Unlimited PLUS Package - \$12.00

- Gold Package
- Includes Unlimited Long Distance

Basic Phone Service Program

Everyone qualifies for only \$27.75 per month. There is no credit check or deposit for basic service! The sign-up will only take approximately 5 minutes and is hassle free!

*Feature pricing different for Basic.

405.752.5900 • 866.441.2144

Cashland Locations

NORTH

1424 W. Britton Road
Oklahoma City
405-843-8480

NORTHEAST

1901 N.E. 23rd Street
Oklahoma City
405-424-1222

SOUTHWEST

3013 S.W. 29th Street
Oklahoma City
405-681-4447

YUKON

604 W. Vandament
Yukon
405-354-4200

LAWTON

5525 N.W. Cache Road
Lawton
580-351-1222

TULSA

6229 E. 21st Street
Tulsa
918-838-2435

ENID

2312a W. Owen K. Garriott
Enid
580-234-4447

NORTHWEST

4625 N.W. 39th Street
Oklahoma City
405-789-4600

SOUTH

929 S.W. 59th Street
Oklahoma City
405-634-7874

MIDWEST CITY

1948 S. Air Depot
Midwest City
405-736-1444

GUTHRIE

618 S. Division
Guthrie
405-260-2999

LAWTON

8 N.W. Sheridan Road
Lawton
580-248-1271

TULSA

11003 E. 41st Street
Tulsa
918-622-0343

Stop in Today!

- This is a Lifeline service provided by The Telephone Company, Inc., which is an eligible telecommunications carrier.
- Lifeline is a government assistance program.
- Service is non-transferable.
- Only one Lifeline discount may be received per household.
- Only eligible consumers may enroll in the program.
- Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.
- Customers must present proper documentation confirming eligibility for the Lifeline program through participation in Federal Public Housing Assistance, Food Stamps, Low-Income Home Energy Assistance Program (LIHEAP), Income below 135% of the Federal Poverty Guidelines, Medicaid, National School Lunch's Free Lunch Program, Supplemental Security Income (SSI), Temporary Assistance to Needy Families (TANF). Additional Program Based Eligibility criteria varies by state. Proof of eligibility includes an eligible program card or statement of benefits.

The Telephone Company, Inc.

www.ttcok.com

The Telephone Company, Inc.

405.752.5900 • 866.441.2144

Wireless Lifeline Service

\$1.00
a month

Unlimited Talk

\$5.00
a month

*Unlimited Talk,
Text and Picture
Messaging*

\$9.95
a month

*Unlimited Talk, Text, Picture
Messaging, 100MB of Data and
Unlimited International Calling**

**No Contract • No Credit Check
No Deposit**

**Sign up now and get
a FREE Cell Phone!**

**GET STARTED NOW
FOR FREE!***

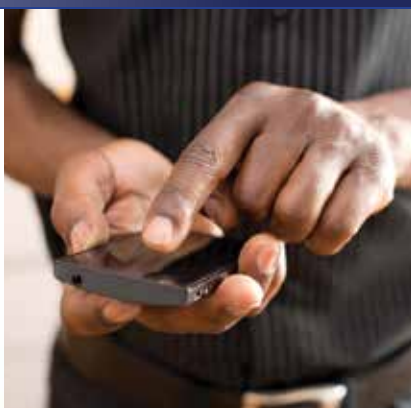
www.ttcok.com

*Some restrictions apply



Get Started for **FREE!***

Free Phone! Free First Month of Service! No Connection Fee!*



The Telephone Company, Inc. was founded to provide our valued customers with a cost-effective home and cellular phone service. Today, our goal remains the same – to help our customers stay connected for less. As our customers' needs have changed, so have our service offerings.

We now offer the most comprehensive wireless phone service plan available featuring Unlimited Talk & Text with Picture Messaging at only \$5 a month!

GET STARTED NOW FOR FREE!**

Getting connected is simple. **NO CREDIT CHECK, NO DEPOSIT, NO HASSLES.** Simply go to one of the convenient Cashland locations and a friendly staff member will quickly get you signed up.

Lifeline Wireless Phone Service

Our Monthly Lifeline Wireless Plans:

- \$1.00 Unlimited Talk**
- \$5.00 Unlimited Talk, Text and Picture Messaging**
- \$9.95 Unlimited Talk, Text, Picture Messaging, 100MB of Data and Unlimited International Calling**

Wireless Phone Service:

- Unlimited Nationwide Calling
- FREE Cell Phone with Signup
- Unlimited Talk & Text Available
- Unlimited Picture Messaging Available
- FRIENDLY LOCAL Representatives
- Prepaid, No Contract Monthly Plan

*Available on \$5.00 plan. **Some restrictions apply.

To receive this service program you must participate in one of the following programs:

- Food Stamps
- Medicaid
- SSI
- Vocational Rehabilitation
- OK Sales Tax Relief
- Public Housing AFDC
- Subsidized Head Start
- Free School Lunches

Deferred connection fee options allow easy, low cost startup.

SIGN UP NOW AND RECEIVE A FREE CELL PHONE.**

**The
Telephone
Company,
Inc.**

405.752.5900 • 866.441.2144

www.ttcok.com

The Telephone Company, Inc.

405.752.5900 • 866.441.2144



**Home Phone
Service
Starting at
\$1.95**

Lifeline Program

- \$1.95 a month
- Connection fee of \$29.38

Connection fee payments may be deferred for up to 6 months. Stop by one of our Cashland locations for program details.

**Don't qualify for the Lifeline Program?
Try our Basic Program!**

Basic Phone Service Program

Everyone qualifies for only \$27.75 per month. There is no credit check or deposit for basic service! The sign-up will only take approximately 5 minutes and is hassle free!

*Feature pricing different for Basic.

**Feature Packages and Long Distance
Packages available for each program.
Call for details.**

www.ttcok.com

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- Customers must present proper documentation confirming eligibility for the Lifeline program through participation in Federal Public Housing Assistance, Food Stamps, Low-Income Home Energy Assistance Program (LIHEAP), Income below 135% of the Federal Poverty Guidelines, Medicaid, National School Lunch's Free Lunch Program, Supplemental Security Income (SSI), Temporary Assistance to Needy Families (TANF). Additional Program Based Eligibility criteria varies by state. Proof of eligibility includes an eligible program card or statement of benefits.

The
Telephone
Company,
Inc.

www.ttcok.com

EXHIBIT C



Income Eligibility Worksheet



Lifeline

2013 Federal Poverty Guidelines – 135%

Household Size	48 Contiguous States and D.C.	Alaska	Hawaii
1	\$15,512	\$19,373	\$17,861
2	\$20,939	\$26,163	\$24,098
3	\$26,366	\$32,954	\$30,335
4	\$31,793	\$39,744	\$36,572
5	\$37,220	\$46,535	\$42,809
6	\$42,647	\$53,325	\$49,046
7	\$48,074	\$60,116	\$55,283
8	\$53,501	\$66,906	\$61,520
For each additional person, add	\$5,427	\$6,791	\$6,237

Please Note:

- Source: Federal Register, Vol. 78, No. 16, January 24, 2013, pp. 5182-5183
- The federal poverty guidelines are typically updated at the end of January.

Applicants must list the number of individuals in their household on the Lifeline Enrollment form. Applicant seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to verify eligibility;

- ✓ The prior year's state, federal, or tribal tax return
- ✓ Current income statement from employer

- ✓ Paycheck stub
- ✓ Social Security statement of benefits
- ✓ Veterans Administration statement of benefits
- ✓ Retirement/pension statement of benefits
- ✓ Unemployment/worker's compensation statement of benefits
- ✓ Federal or Tribal notice letter of participation in General Assistance
- ✓ A divorce decree, child support award, or other official document containing income information for at least three months

Lifeline service is provided by The Telephone Company, Inc. and is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Customers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a nontransferable benefit and cannot be transferred to any other person.